

## **Exhibit 21**

# **SCHOOL DISTRICT/LOCAL GOVERNMENT ENTITY PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO EXCLUDE TESTIMONY OF SCHOOL DISTRICT EXPERTS**

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

**From:** [Watts, Phillip - Superintendent](#)  
**To:** [All Breathitt Employees](#)  
**Subject:** Survey (Internal Memo) - Friendly Reminder  
**Date:** Tuesday, April 22, 2025 3:09:00 PM

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Leaders,

We wanted to send a reminder that our school district is currently conducting a very important research survey to better understand the experiences and challenges faced by our school personnel. ***Your opinions are critical to this research, so we ask that you please take a few moments to complete this survey.***

The survey seeks to gather insights into:

- Professional needs from educators
- Perspectives on current trends in education

Applied Marketing Science (a market research consulting firm) is working with a third-party, Luth Research, who has already contacted you via email with a link to the survey, which should take ***no more than 10 minutes to complete.***

**What's involved?**

Please look for an email from [AppliedMarketingScience@surveysavvy.com](mailto:AppliedMarketingScience@surveysavvy.com) in your inbox with a link to the survey. You will also be receiving a reminder email in the next few days. You can now complete the survey by no later than Friday, April 25th.

**Please be assured of the following:**

- Your participation in the survey **will not affect your performance evaluation** in any way.
- Your responses to the survey will be kept **completely anonymous**. Your supervisor or school district **will not** be able to connect your responses to you.
- Responses will be **used only in aggregate** – meaning no individual responses will ever be identified or singled out.
- Your feedback is intended to help us better support educators and improve the overall learning environment, not to assess individual performance.

We thank you in advance for your participation in this important research.

Sincerely,

Thanks,

Phillip Watts  
Breathitt County Schools  
Superintendent  
(606) 693-4902  
"Graduates Prepared For College, Career, and Community"  
#TeamBreathitt

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